

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

A.J. and Q.C.,

Plaintiffs,

v.

MASP, LLC,

Defendant.

CIVIL ACTION FILE NO.

1:23-CV-04247-JPB

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**DEFENDANT MASP, LLC’S MOTION TO FILE UNDER SEAL**

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COMES NOW, MASP, LLC (hereinafter “Defendant”), by and through the undersigned counsel, and, pursuant to Section II.J. of the Court’s Appendix H to the Local Rules, hereby moves the Court for leave to file under seal the exhibits filed with its Brief in Support of its Motion for Summary Judgment and its Motion to Exclude Plaintiff’s Expert Witness, Anique Whitmore [Docs. 62-2, 65-5, 65-6, 65-7, 65-8, 65-9] because Plaintiffs were minor sex trafficking victims and the information contained in these Exhibits are of a highly intimate and personal nature that should be protected from disclosure to the public.

Pursuant to Section II.J. of the Court’s Appendix H to the Local Rules, Defendant understands it is Defendant’s burden to establish good cause for sealing,

and has filed a Brief in Support of Motion to File Under Seal contemporaneously with this Motion to File Under Seal.

For the reasons mentioned in Defendant's Brief in Support of Motion to File Under Seal, Defendant respectfully requests that, for good cause, this Court grant its motion to file these Exhibits, filed with the Court as Docs. 62-2, 65-5, 65-6, 65-7, 65-8, 65-9, under seal.

Respectfully submitted, this 15th day of October, 2024.

SWIFT, CURRIE, McGHEE & HIERS

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**CERTIFICATE OF COMPLIANCE**

Counsel hereby certifies that this document has been prepared with one of the font and point selections approved by the Court pursuant to L.R. 5.1(C) of the Northern District of Georgia, specifically, 14 point, Times New Roman font.

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**CERTIFICATE OF SERVICE**

This are to certify that on the 15th day of October, 2024, I have caused to be served upon counsel for all parties a true and correct copy of the foregoing **DEFENDANT MASP, LLC's MOTION TO FILE UNDER SEAL** by filing same through use of the Court's online filing system, the CM/ECF system for the United States District Court for the Northern District of Georgia, which will serve all counsel of record.

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